

1           **Richard C. Miller, F0458**  
2           **BANES HOREY BERMAN & MILLER, LLC**  
3           **Suite 201, Marianas Business Plaza**  
4           **P.O. Box 501969**  
5           **Saipan, MP 96950**  
6           **Tel.: (670) 234-5684**  
7           **Fax: (670) 234-5683**  
8           **Email: RMiller@pacificlawyers.law**

9  
10          *Attorneys for Plaintiffs*

11  
12          **IN THE DISTRICT COURT**  
13          **FOR THE NORTHERN MARIANA ISLANDS**

14          **ÖZCAN GENÇ, HASAN GÖKÇE, and         )**           **Civil Case No. 1:20-cv-00031**  
15          **SÜLEYMAN KÖŞ, on behalf of themselves     )**  
16          **and all other persons similarly situated,     )**  
17                                                              **)**           **STATUS UPDATE TO MOTION TO**  
18                                                              **)**           **APPROVE CLASS NOTICE**  
19                                                              **)**  
20                                                              **)**           **Judge: Manglona, C.J.**  
21                                                              **)**           **Hearing: March 11, 2022**  
22                                                              **)**           **Time: 1:30 p.m.**  
23          **Plaintiffs,                                            )**  
24          **vs.                                                    )**  
25          **IMPERIAL PACIFIC INTERNATIONAL                )**  
26          **(CNMI), LLC, and IMPERIAL PACIFIC         )**  
27          **INTERNATIONAL HOLDINGS LTD.,                )**  
28          **Defendants.                                        )**  
29          

---

30          Plaintiffs submit this status update prior to the March 11 hearing on their Motion to  
31          Approve Class Notice (ECF No. 54) to apprise the Court of further information about the  
32          progress of securing class members' contact information.

33          Plaintiffs have compiled telephone numbers and postal addresses for 101 individuals out  
34          of the 104 named in the Excel spreadsheet obtained from IPI.<sup>1</sup> Plaintiffs do not have reliable  
35          email addresses for them, but they could receive notices electronically as PDFs or GIFs via

36          

---

<sup>1</sup> Class counsel will send this updated spreadsheet to the Court's USDCNMI inbox. The three  
37          persons on IPI's list for whom Plaintiffs do not have personal contact information – Caner Aksu,  
38          Volkan Koymen, and Mustafa Turan – were supervisors from former Defendant IDS  
39          Development Management Consultancy.

1 WhatsApp. Notices could also be sent out by First Class Mail. The cost would be \$1.65 (up to 2  
2 ounces) or \$2.40 (up to 3 ounces) per letter.

3 Also, Plaintiffs have arranged for a professional translation service in Turkey to provide a  
4 certified translation of the notice into Turkish.

5 Respectfully submitted this 9th day of March, 2022.  
6

7 BANES HOREY BERMAN & MILLER, LLC

8 \_\_\_\_\_ /s/  
9 by Richard C. Miller, F0458  
Attorney for Plaintiff

10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28